

1. *In the Matter of Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 99-200, FCC 00-104 (March 17, 2000) ("*Report and Order*").

of telecommunications carriers according to the NANPA formula.”¹ The FCC also concludes, with respect to carrier-specific costs directly related to thousands-block pooling, that “requiring carriers to bear and recover their own carrier-specific costs is consistent with the competitive neutrality requirements in section 251(e)(2).¹ The VTPSB agrees with the FCC that the costs associated with national thousands-block pooling be recovered at the national level. The FCC should further clarify that the costs associated with the proposed national pooling rollout, which includes Vermont's 802 NPA, shall be recovered through a national cost recovery mechanism.

The proposed rollout schedule provides individual states with an appropriate level of scheduling flexibility for this transition. By continuing to consider petitions of states outside the top 100 MSAs and those states which not yet received delegated authority to opt into the schedule, and by allowing states to substitute alternative NPAs for those already included in the schedule, the FCC has ensured that the proposed rollout schedule will allow states the flexibility they need to operate within the schedule. Similarly, the FCC should allow the industry flexibility, to the extent that this does not interfere with other states' pooling efforts, to modify the accelerated pooling rollout schedule if necessary. This type of flexibility should avoid any need for wholesale changes to the proposed rollout schedule.

Respectfully submitted this _____ day of _____, 2001.

By: _____

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2. *Id.* at ¶ 207.

3. *Id.* at ¶ 209.

